

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

ERIC B. CORDER,	)	
	)	
Plaintiff,	)	
	)	2015 CV 09633
v.	)	
	)	Judge Andrea Wood
CITY OF CHICAGO, ROBERT	)	Magistrate Judge Shelia Finnegan
STEGMILLER, ROBERT GALLAS,	)	
JOHN O'KEEFE, DANIEL PACELLI,	)	<b>JURY TRIAL DEMANDED</b>
VINCENT CIOCCI, and	)	
MICHAEL KARCZEWSKI,	)	
	)	
Defendants.	)	
	)	

**CORRECTED AMENDED COMPLAINT AT LAW**

NOW COMES the Plaintiff, ERIC B. CORDER, by and through his Attorney, BRIAN J. GRABER, LTD., and complains of Defendants, CITY OF CHICAGO; ROBERT STEGMILLER, individually and as agent of City of Chicago; ROBERT GALLAS, individually, and as agent of the City of Chicago; JOHN OKEEFE, individually and as agent of the City of Chicago; DANIEL PACELLI, individually and as agent of the City of Chicago; VINCENT CIOCCI, individually and as agent of the City of Chicago; and MICHAEL KARCZEWSKI, individually and as agent of the City of Chicago; and in support thereof states as follows:

**JURISDICTION AND VENUE**

1. This action is brought against Defendants, CITY OF CHICAGO, ROBERT STEGMILLER, Individually and as agent of the City of Chicago, (hereinafter referred to as "STEGMILLER"), ROBERT GALLAS, Individually and as agent of the City of Chicago, (hereinafter referred to as "GALLAS"), JOHN O'KEEFE, Individually and as agent of the City of Chicago, (hereinafter referred to as "O'KEEFE"), DANIEL PACELLI, Individually, and

agent of the City of Chicago, (hereinafter referred to as “PACELLI”), VINCENT CIOCCI, Individually, and as agent of the City of Chicago, (hereinafter referred to as “CIOCCI”) and MICHAEL KARCZEWSKI, Individually and as agent of the City of Chicago, (hereinafter referred to as “KARCZEWSKI”), pursuant to 42 U.S.C. §1983 for acts or omissions committed by the Defendants under color of law in violation of the Constitutional Rights guaranteed to the Plaintiff by the 4<sup>th</sup> and 14<sup>th</sup> Amendments to be free from unlawful arrest and search and seizure seeking any and all damages allowed by law including compensatory damages, punitive damages, equitable relief, attorney’s fees, litigation expenses, and expert witness fees.

2. Subject matter jurisdiction of this Court is invoked pursuant to 28 U.S.C. §1331 as to Plaintiff, ERIC B. CORDER’S claims for unlawful arrest and search and seizure in violation his Constitutional rights guaranteed by the 4<sup>th</sup> and 14<sup>th</sup> Amendments to the U.S. Constitution against Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, AND O’KEEFE, and each of them, 28 U.S.C. §1367 for Plaintiff’s tort claims against the Defendants.

3. Venue is proper within this District pursuant to 28 U.S.C. §1391(b)(2) where a substantial number of Defendants’ actions and omissions in violation of 42 U.S.C. §1983 occurred in the Northern District of Illinois, Eastern Division at the 4500 block of Lawlor Avenue, located in Chicago, Cook County, Illinois.

4. Filed lawsuits:

- a) Coder v. Dart, Docket No. unknown  
Filed in 2009  
Constitutional violation  
Settlement agreement
- b) Coder v. Dart, Docket No. unknown  
Filed in 2015  
Filed in the U.S. District Court, Eastern Division  
Pending before Judge Chang  
Constitutional violations

Currently pending.

- c) Corder v. Turisse, et al.  
Filed in 2009  
Filed in U.S. District Court, Eastern Division  
Judge is unknown  
Constitutional violations  
Settlement agreement
- d) Corder v. Martinez, et al.  
Filed in 2015  
Filed in the U.S. District Court, Eastern Division  
Judge Chang  
Constitutional violations  
Currently pending.
- e) Corder v. Sebastian, et al.  
Filed in 2009  
Filed in U.S. District Court, Eastern Division  
Constitutional violations  
Dismissed.
- f) Corder v. John Doe Dentist, et al.  
Filed in 2015  
Filed in U.S. District Court, Eastern Division  
Judge Chang  
Constitutional violations  
Pending.

### **PARTIES**

5. At all times mentioned herein, Plaintiff, ERIC B. CORDER, was and is a citizen of the United States residing in the City of Chicago, County of Cook, and State of Illinois.

6. At all times mentioned herein, Defendant, CITY OF CHICAGO, was a municipal corporation, organized under the laws of the State of Illinois, and operated, managed, maintained, and controlled the Chicago Police Department.

7. At all times mentioned herein, Defendant, CITY OF CHICAGO, employed Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, as Chicago police officers.

8. At all times mentioned herein, Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, were Chicago police officers employed by the Defendant, CITY OF CHICAGO, and acting under color of law of the State of Illinois.

**ALLEGATIONS COMMON TO ALL CAUSES OF ACTION**

9. At all times mentioned herein, on and before October 26, 2014, Defendant, CITY OF CHICAGO, had a widespread custom of a "code of silence" among police officer in the Chicago Police Department not to truthfully report police officers' violations of the public's civil rights.

10. At all times mentioned herein, on and before October 26, 2014, Defendant, CITY OF CHICAGO, has a widespread custom of failing to adequately investigating and/or disciplining Chicago Police officers that violated the civil rights of the public.

11. In Obrycka v. City of Chicago, 913 F. Supp.2d 598 (N.D. Ill. 2012) a jury found that a code of silence and/or widespread custom of failing to adequately investigate and discipline Chicago police officers existed in the ranks of the Chicago Police Department.

12. Chicago Mayor Rahm Emanuel acknowledged a "code of silence" within the Chicago Police Department during a December of 2015 press conference.

13. Investigations into the Laquan McDonald shooting and David Koschman murder demonstrate evidence of widespread of a custom in the Chicago Police Department to fabricate evidence to protect police officers and a failure to adequately investigate and discipline Chicago Police officers who fabricate evidence so as to embolden police officers to violate the civil rights of law abiding citizens.

14. At all times mentioned herein, on and before October 26, 2014, Defendant, CITY OF CHICAGO, policy makers should have been aware of the risks created by these custom and practices and failed to take any appropriate steps to correct it.

15. On or about October 26, 2014, Defendant, CITY OF CHICAGO's failure to correct the code of silence and refusal to discipline officers that fabricate evidence against citizens to cover-up civil rights violations caused Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, to violate Plaintiff, ERIC CORDER's Constitutional Rights.

16. On or about October 26, 2014, Plaintiff, ERIC B. CORDER, was out and about on the public way not committing a crime, had not committed a crime, nor did his actions indicate any suspicion of criminal activity while standing in front of the residence known as 4549 S. Lawler Avenue in the City of Chicago, County of Cook, and State of Illinois.

17. On or about October 26, 2014, Defendants, STEGMILLER, GALLAS, and O'KEEFE, and each of them, drove up southbound on the 4500 block of Lawler Avenue in a gray unmarked Chicago Police SUV.

18. On or about October 26, 2014, Defendants, STEGMILLER, GALLAS, and O'KEEFE, and each of them, in the vicinity of 4549 S. Lawler exited the gray Chicago Police SUV driven by Defendant, STEGMILLER.

19. On or about October 26, 2014, Defendant, O'KEEFE, without legal justification grabbed and handcuffed Plaintiff, ERIC B. CORDER, simultaneously, as Defendant, STEGMILLER, grabbed another male African-American and handcuffed him to the Plaintiff, ERIC B. CORDER.

20. On or about October 26, 2014, Defendants, STEGMILLER, GALLAS, and O'KEEFE, and each of them, unlawfully arrested Plaintiff, ERIC B. CORDER, in violation of his rights guaranteed by the 4<sup>th</sup> and 14<sup>th</sup> Amendment without any probable cause or arrest warrant.

21. On or about October 26, 2014, Defendant, O'KEEFE, without any legal justification, probable cause, or search warrant, unlawfully searched Plaintiff, ERIC B. CORDER'S clothing, garments, person, and crotch area in violation of his rights guaranteed by the 4<sup>th</sup> and 14<sup>th</sup> Amendment.

22. On or about October 26, 2014, Defendant, GALLAS, without any legal justification, probable cause, or search warrant, unlawfully searched Plaintiff, ERIC B. CORDER'S gym bag in violation of his rights guaranteed by the 4<sup>th</sup> and 14<sup>th</sup> Amendment.

23. On or about October 26, 2014, Defendant, STEGMILLER, stood guard over the illegal arrest and illegal search activities of Defendants, O'KEEFE, and GALLAS.

24. On or about October 26, 2014, a black unmarked squad arrived with three more Chicago Police officers in it on information and belief, Defendants, PACELLI, CIOCCI, and KARCZEWSKI, and each of them.

25. On or about October 26, 2014, on information and belief, Defendants, PACELLI, CIOCCI, or KARCZEWSKI, and each of them, in the black unmarked squad, unknown to the Plaintiff, ERIC B. CORDER, started an argument with Plaintiff, threatening the Plaintiff, that he and the Chicago Police Department would get the Plaintiff for suing the Chicago Police Department.

26. On or about October 26, 2014, this unknown officer either PACELLI, CIOCCI, or KARCZEWSKI, and each of them, informed the Defendants, STEGMILLER, O'KEEFE, and

GALLAS, and each of them, that Plaintiff, ERIC B. CORDER, had sued some of their fellow colleagues.

27. On or about October 26, 2014, Defendants, PACELLI, CIOCCI, and/or KARCZEWSKI, and Defendants, STEGMILLER, O'KEEFE, and GALLAS, and each of them huddled and congregated with discussions.

28. On or about October 26, 2014, Defendants, PACELLI, CIOCCI, and/or KARCZEWSKI stated to Plaintiff, ERIC CORDER, "Let me see you beat this one when we write it up," or words to that effect.

29. On or about October 26, 2014, Defendants, STEGMILLER, O'KEEFE, and GALLAS, and each of them transported Plaintiff, ERIC B. CORDER, to the Homan and Fillmore Police station and on information and belief, Defendants, STEGMILLER, O'KEEFE, GALLAS, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, fabricated false charges of manufacturing with the intent to deliver a controlled substance of heroin.

30. On and after October 26, 2014, Defendants, STEGMILLER, O'KEEFE, GALLAS, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, subsequently filed false police reports were written, sworn to and submitted along with perjured court testimony by Defendant, STEGMILLER, that the Plaintiff, ERIC B. CORDER, possessed heroin.

31. On or about October 26, 2014, Defendants, STEGMILLER, O'KEEFE, GALLAS, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, fabricated other false evidence of heroin, blender, scale, spoons, razor blades, plate, sandwich bags, and green tinted baggies and submitted them against the Plaintiff, ERIC CORDER, to the Cook County State's Attorney to be used as evidence against Plaintiff in a criminal prosecution which Defendants' acts and omissions served as the catalyst.

32. As a result of Defendants, STEGMILLER, O'KEEFE, GALLAS, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, fabricating evidence against Plaintiff, ERIC CORDER, and having him charged with alleged violations of 720 ILCS 570/407(B)(1) and 720 ILCS 570/401(C)(1), Plaintiff, ERIC CORDER'S bail was revoked and he was held in custody.

33. On or about February 3, 2016, Plaintiff, ERIC CORDER, filed a Motion to Quash Arrest and Suppress Evidence in criminal case No. 14 CR 2169201.

34. On information and belief, Defendants, STEGMILLER, O'KEEFE, GALLAS, PACELLI, CIOCCI, and/or KARCZEWSKI, were ordered to appear and testify at Plaintiff's Motion to Quash Arrest and Suppress Evidence in criminal case No. 14 CR 2169201 from February 3, 2016, through July 15, 2016.

35. On or about July 15, 2016, the criminal case No. 14 CR 2169201 was dismissed by the Cook County State's attorney because they did not have sufficient evidence to prosecute Plaintiff, ERIC CORDER.

36. On or about October 21, 2015, Plaintiff, ERIC CORDER, was in custody and jailed and timely filed his cause of actions by giving his original Complaint at Law to prison officials to mail to the Clerk of the U.S. District Court for filing.

37. On or about October 28, 2015, the Clerk of the U.S. District Court filed Plaintiff, ERIC CORDER'S original Complaint at Law, however, Plaintiff's original Complaint was timely filed on October 21, 2015, when the Plaintiff placed it in the hands of prison officials to mail to the Clerk of the U.S. District Court for filing.



**COUNT I**

**42 U.S.C. §1983 – FALSE ARREST-VIOLATIONS OF 4<sup>TH</sup> AND 14<sup>TH</sup> AMENDMENTS**

NOW COMES Plaintiff, ERIC B. CORDER, by and through his Attorney, BRIAN J. GRABER, LTD., and complaining Defendants, Defendants, CITY OF CHICAGO; ROBERT STEGMILLER, individually and as agent of City of Chicago; ROBERT GALLAS, individually, and as agent of the City of Chicago; JOHN OKEEFE, individually and as agent of the City of Chicago; DANIEL PACELLI, individually and as agent of the City of Chicago; VINCENT CIOCCI, individually and as agent of the City of Chicago; and MICHAEL KARCZEWSKI, individually and as agent of the City of Chicago, and each of them pursuant to 42 U.S.C. §1983 arrested Plaintiff, ERIC CORDER, in violation of his 4<sup>th</sup> and 14<sup>th</sup> Amendments to the U.S. Constitution and in support thereof states as follows:

1-37. Plaintiff re-alleges Paragraphs 1 through 37 as Paragraphs 1 through 37 of Count I.

38. On or about October 26, 2014, Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, were acting under color of law as Chicago Police Officers.

39. On or about October 26, 2014, Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, did not have probable cause to arrest Plaintiff, ERIC CORDER.

40. On or about October 26, 2014, Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, in violation of 42 U.S.C. §1983 violated Plaintiff, ERIC CORDER'S 4<sup>th</sup> and 14<sup>th</sup> Amendment rights by arresting him without probable cause.

41. As a direct and proximate cause of Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, violation of Plaintiff, ERIC CORDER'S rights under the 4<sup>th</sup> and 14<sup>th</sup> Amendments, pursuant to 42 U.S.C. §1983, Plaintiff suffered damages including but not limited to compensatory damages for mental and emotional pain and suffering, loss of normal life, loss of enjoyment of life, lost income, or inability to work.

42. As a direct and proximate cause of Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, acted with maliciously or in reckless disregard for Plaintiff's right to be free from unlawful arrest in violation of his 4<sup>th</sup> and 14<sup>th</sup> Amendment Rights and seeks an award of punitive damages.

43. Pursuant to 42 U.S.C. §1988, Plaintiff, ERIC CORDER, seeks reasonable attorney's fees and expenses incurred, including but not limited litigation expenses and expert witness fees from Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them.

WHEREFORE the Plaintiff, ERIC B. CORDER, seeks judgment against Defendants, CITY OF CHICAGO; ROBERT STEGMILLER, individually and as agent of City of Chicago; ROBERT GALLAS, individually, and as agent of the City of Chicago; JOHN OKEEFE, individually and as agent of the City of Chicago; DANIEL PACELLI, individually and as agent of the City of Chicago; VINCENT CIOCCI, individually and as agent of the City of Chicago; and MICHAEL KARCZEWSKI, individually and as agent of the City of Chicago, and each of them in excess of One Million Dollars, \$1,000,000.00, plus attorney's fees, litigation costs, and expert witness fees.

## **COUNT II**

### **42 U.S.C. §1983 – ILLEGAL SEARCH IN VIOLATION OF 4<sup>TH</sup> AND 14<sup>TH</sup>**

#### **AMENDMENTS**

NOW COMES Plaintiff, ERIC B. CORDER, by and through his Attorney, BRIAN J. GRABER, LTD., and complaining Defendants, Defendants, CITY OF CHICAGO; ROBERT STEGMILLER, individually and as agent of City of Chicago; ROBERT GALLAS, individually, and as agent of the City of Chicago; JOHN OKEEFE, individually and as agent of the City of Chicago; DANIEL PACELLI, individually and as agent of the City of Chicago; VINCENT CIOCCI, individually and as agent of the City of Chicago; and MICHAEL KARCZEWSKI, individually and as agent of the City of Chicago, and each of them pursuant to 42 U.S.C. §1983 searched Plaintiff, ERIC CORDER, in violation of his 4<sup>th</sup> and 14<sup>th</sup> Amendments to the U.S. Constitution and in support thereof states as follows:

1-37. Plaintiff re-alleges Paragraphs 1 through 37 as Paragraphs 1 through 37 of Count II.

38. On or about October 26, 2014, Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, had no probable cause to search Plaintiff, ERIC B. CORDER.

39. On or about October 26, 2014, Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, searched Plaintiff, ERIC B. CORDER's person, without any probable cause in violation of his rights under the 4<sup>th</sup> and 14<sup>th</sup> Amendments to the U.S. Constitution.

40. On or about October 26, 2014, Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of

them, had no probable cause to search Plaintiff, ERIC B. CORDER's gym bag without any probable cause in violation of his rights under the 4<sup>th</sup> and 14<sup>th</sup> Amendments to the U.S. Constitution.

41. On or about October 26, 2014, Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, violated 42 U.S.C. §1983 by illegally searching Plaintiff, ERIC B. CORDER's person and gym bag in violation of his 4<sup>th</sup> and 14<sup>th</sup> Amendment to be free from unlawful searches and seizures.

42. As a direct and proximate cause of Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, violation of Plaintiff, ERIC CORDER'S rights under the 4<sup>th</sup> and 14<sup>th</sup> Amendments, pursuant to 42 U.S.C. §1983, Plaintiff suffered damages including but not limited to compensatory damages for mental and emotional pain and suffering, loss of normal life, loss of enjoyment of life, lost income, or inability to work.

43. As a direct and proximate cause of Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, acted with maliciously or in reckless disregard for Plaintiff's right to be free from unlawful arrest in violation of his 4<sup>th</sup> and 14<sup>th</sup> Amendment Rights and seeks an award of punitive damages.

44. Pursuant to 42 U.S.C. §1988, Plaintiff, ERIC CORDER, seeks reasonable attorney's fees and expenses incurred, including but not limited litigation expenses and expert witness fees from Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them.

WHEREFORE the Plaintiff, ERIC B. CORDER, seeks judgment against Defendants, CITY OF CHICAGO; ROBERT STEGMILLER, individually and as agent of City of Chicago; ROBERT GALLAS, individually, and as agent of the City of Chicago; JOHN OKEEFE, individually and as agent of the City of Chicago; DANIEL PACELLI, individually and as agent of the City of Chicago; VINCENT CIOCCI, individually and as agent of the City of Chicago; and MICHAEL KARCZEWSKI, individually and as agent of the City of Chicago, and each of them in excess of One Million Dollars, \$1,000,000.00, plus attorney's fees, litigation costs, and expert witness fees.

### **COUNT III**

#### **42 U.S.C. §1983 1<sup>ST</sup> AMENDMENT RETALIATORY ARREST**

NOW COMES Plaintiff, ERIC B. CORDER, by and through his Attorney, BRIAN J. GRABER, LTD., and complaining Defendants, Defendants, CITY OF CHICAGO; ROBERT STEGMILLER, individually and as agent of City of Chicago; ROBERT GALLAS, individually, and as agent of the City of Chicago; JOHN OKEEFE, individually and as agent of the City of Chicago; DANIEL PACELLI, individually and as agent of the City of Chicago; VINCENT CIOCCI, individually and as agent of the City of Chicago; and MICHAEL KARCZEWSKI, individually and as agent of the City of Chicago, and each of them pursuant to 42 U.S.C. §1983 arrested Plaintiff, ERIC CORDER, in violation of his 4<sup>th</sup> and 14<sup>th</sup> Amendments to the U.S. Constitution and in support thereof states as follows:

1-37. Plaintiff re-alleges Paragraphs 1 through 37 as Paragraphs 1 through 37 of Count III.

38. On or about October 26, 2014, Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, were acting under color of law as Chicago Police Officers.

39. On or about October 26, 2014, Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, did not have probable cause to arrest Plaintiff, ERIC CORDER.

40. On and before October 26, 2014, Plaintiff, ERIC CORDER, engaged in conduct that is constitutionally protected activity and speech under the 1<sup>st</sup> Amendment to the U.S. Constitution by filing lawsuits against City of Chicago and various Chicago Police officers for violating his Constitutionally protected civil rights.

41. On or about October 26, 2014, Defendants, PACELLI, CIOCCI, and KARCZEWSKI, and/or each of them, were aware that Plaintiff, ERIC CORDER, engaged in constitutionally protected activity and speech under the 1<sup>st</sup> Amendment to the U.S. Constitution by filing lawsuits against the City of the Chicago and various Chicago Police officers for violating his Constitutionally protected civil rights.

42. On or about October 26, 2014, Defendants, PACELLI, CIOCCI, and KARCZEWSKI, and/or each of them informed Defendants, STEGMILLER, O'KEEFE, and GALLAS, that Plaintiff, ERIC CORDER, engaged in constitutionally protected activity and speech under the 1<sup>st</sup> Amendment to the U.S. Constitution by telling them that Plaintiff files lawsuits against the City of Chicago and police officers.

43. On or about October 26, 2014, Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, retaliated against Plaintiff, ERIC CORDER, for exercising his rights under the 1<sup>st</sup>

Amendment to the U.S. Constitution by violating Plaintiff, ERIC CORDER'S 4<sup>th</sup> and 14<sup>th</sup> Amendment rights by arresting him without probable cause.

44. On or about October 26, 2014, Plaintiff, ERIC CORDER'S exercise of his rights under the 1<sup>st</sup> Amendment to the U.S. Constitution by filing lawsuits against the City of Chicago and Chicago Police officers that violate his civil rights was a substantial or motivating factor for Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, to retaliate against Plaintiff, ERIC CORDER, and arrest him without any probable cause and fabricate evidence against Plaintiff for the arrest.

45. As a direct and proximate cause of Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, violation of Plaintiff, ERIC CORDER'S rights under the 1<sup>st</sup>, 4<sup>th</sup>, and 14<sup>th</sup> Amendments, pursuant to 42 U.S.C. §1983, Plaintiff suffered damages including but not limited to compensatory damages for mental and emotional pain and suffering, loss of normal life, loss of enjoyment of life, lost income, or inability to work.

46. As a direct and proximate cause of Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, acted with maliciously or in reckless disregard for Plaintiff's rights and retaliated against Plaintiff for exercising his rights under the 1<sup>st</sup> Amendment by arresting Plaintiff in violation of his 4<sup>th</sup> and 14<sup>th</sup> Amendment Rights and Plaintiff seeks an award of punitive damages.

47. Pursuant to 42 U.S.C. §1988, Plaintiff, ERIC CORDER, seeks reasonable attorney's fees and expenses incurred, including but not limited litigation expenses and expert witness fees from Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them.

WHEREFORE the Plaintiff, ERIC B. CORDER, seeks judgment against Defendants, CITY OF CHICAGO; ROBERT STEGMILLER, individually and as agent of City of Chicago; ROBERT GALLAS, individually, and as agent of the City of Chicago; JOHN OKEEFE, individually and as agent of the City of Chicago; DANIEL PACELLI, individually and as agent of the City of Chicago; VINCENT CIOCCI, individually and as agent of the City of Chicago; and MICHAEL KARCZEWSKI, individually and as agent of the City of Chicago, and each of them in excess of One Million Dollars, \$1,000,000.00, plus attorney's fees, litigation costs, and expert witness fees.

#### **COUNT IV**

##### **42 U.S.C. §1983 CIVIL CONSPIRACY TO FALSELY ARREST**

NOW COMES Plaintiff, ERIC B. CORDER, by and through his Attorney, BRIAN J. GRABER, LTD., and complaining Defendants, Defendants, CITY OF CHICAGO; ROBERT STEGMILLER, individually and as agent of City of Chicago; ROBERT GALLAS, individually, and as agent of the City of Chicago; JOHN OKEEFE, individually and as agent of the City of Chicago; DANIEL PACELLI, individually and as agent of the City of Chicago; VINCENT CIOCCI, individually and as agent of the City of Chicago; and MICHAEL KARCZEWSKI, individually and as agent of the City of Chicago, and each of them engaged in a civil conspiracy pursuant to 42 U.S.C. §1983 to fabricate evidence to falsely arrest Plaintiff, ERIC CORDER, in violation of his 4<sup>th</sup> and 14<sup>th</sup> Amendments to the U.S. Constitution and in support thereof states as follows:

1-37. Plaintiff re-alleges Paragraphs 1 through 37 as Paragraphs 1 through 47 of Count IV.



38. On or about October 26, 2014, Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, reached an agreement to deprive Plaintiff, ERIC CORDER, of his constitutional rights under the 4<sup>th</sup> and 14<sup>th</sup> Amendments to the U.S. Constitution falsely arresting Plaintiff, ERIC B. CORDER, and fabricating evidence against Plaintiff, ERIC B. CORDER, that he was manufacturing and dealing heroin in violation of 720 ILCS 507/407(B)(1) and 720 507/407(C)(1) in retaliation for exercising his rights under the 1<sup>st</sup> Amendment to bring lawsuits against the City of Chicago and Chicago Police officers when they violate his civil rights.

39. On or about October 26, 2014, Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, overt acts of fabricating evidence against Plaintiff, ERIC B. CORDER, to create probable cause that he was manufacturing and dealing heroin in violation of Illinois law to deprive Plaintiff, ERIC B. CORDER, of his constitutional rights under the 4<sup>th</sup> and 14<sup>th</sup> Amendments to be free from illegal search and seizure.

40. Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, had a meeting of the minds where they lent their minds and physical presence and support along with the support of each other's badges and office, acting in concert detaining, arresting, and searching Plaintiff, ERIC B. CORDER, including fabricating testimony, police reports, and physical evidence for the express purpose of depriving the Plaintiff, ERIC B. CORDER, of his liberty and pursuit of happiness in violation of Plaintiff's 4<sup>th</sup> and 14<sup>th</sup> Amendment rights under the U.S. Constitution.

41. As a direct and proximate cause of Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of

them, conspiring to deprive Plaintiff, ERIC CORDER'S rights under the 4<sup>th</sup> and 14<sup>th</sup> Amendments to be free from unlawful search and seizure, pursuant to 42 U.S.C. §1983, by fabricating evidence against Plaintiff, ERIC CORDER, Plaintiff suffered damages including but not limited to compensatory damages for mental and emotional pain and suffering, loss of normal life, loss of enjoyment of life, lost income, or inability to work.

42. As a direct and proximate cause of Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, acted with maliciously or in reckless disregard for Plaintiff's right to be free from unlawful arrest in violation of his 4<sup>th</sup> and 14<sup>th</sup> Amendment Rights by conspiring to fabricate evidence against Plaintiff, ERIC B. CORDER, and Plaintiff seeks an award of punitive damages.

43. Pursuant to 42 U.S.C. §1988, Plaintiff, ERIC CORDER, seeks reasonable attorney's fees and expenses incurred, including but not limited litigation expenses and expert witness fees from Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them.

WHEREFORE the Plaintiff, ERIC B. CORDER, seeks judgment against Defendants, CITY OF CHICAGO; ROBERT STEGMILLER, individually and as agent of City of Chicago; ROBERT GALLAS, individually, and as agent of the City of Chicago; JOHN OKEEFE, individually and as agent of the City of Chicago; DANIEL PACELLI, individually and as agent of the City of Chicago; VINCENT CIOCCI, individually and as agent of the City of Chicago; and MICHAEL KARCZEWSKI, individually and as agent of the City of Chicago, and each of them in excess of One Million Dollars, \$1,000,000.00, plus attorney's fees, litigation costs, and expert witness fees.

**COUNT V**

**ILLINOIS COMMON LAW FALSE IMPRISONMENT**

NOW COMES Plaintiff, ERIC B. CORDER, by and through his Attorney, BRIAN J. GRABER, LTD., and complaining Defendants, Defendants, CITY OF CHICAGO; ROBERT STEGMILLER, individually and as agent of City of Chicago; ROBERT GALLAS, individually, and as agent of the City of Chicago; JOHN OKEEFE, individually and as agent of the City of Chicago; DANIEL PACELLI, individually and as agent of the City of Chicago; VINCENT CIOCCI, individually and as agent of the City of Chicago; and MICHAEL KARCZEWSKI, individually and as agent of the City of Chicago, and each of them, falsely imprisoned Plaintiff and in support thereof states as follows:

1-37. Plaintiff re-alleges Paragraphs 1 through 37 as Paragraphs 1 through 37 of Count V.

38. On or about October 26, 2014, at all times mentioned herein, Defendant, CITY OF CHICAGO, employed Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, as Chicago Police officers with authority to arrest and imprison citizens.

39. On or about October 26, 2014, and at all times mentioned herein, Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, were agents and employees of the Defendant, CITY OF CHICAGO, acting within the scope of their employment as Chicago Police officers.

40. On or about October 26, 2014, Defendant, CITY OF CHICAGO, acting through its agents and employees, Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI,

CIOCCI, and KARCZEWSKI, and each of them, without any probable cause arrested and imprisoned Plaintiff, ERIC CORDER.

41. On or about October 26, 2014, Defendant, CITY OF CHICAGO, acting through its agents and employees, Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, arrested and imprisoned Plaintiff, ERIC CORDER, without any reasonable grounds to believe Plaintiff committed any offense.

42. As a direct and proximate cause of Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, falsely imprisoning Plaintiff, ERIC CORDER, he suffered damages including but not limited to compensatory damages for mental and emotional pain and suffering, loss of normal life, loss of enjoyment of life, lost income, or inability to work.

43. As a direct and proximate cause of Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, acted with maliciously or in reckless disregard for Plaintiff's right to be free from false imprisonment and seeks an award of punitive damages against them.

WHEREFORE the Plaintiff, ERIC B. CORDER, seeks judgment against Defendants, CITY OF CHICAGO; ROBERT STEGMILLER, individually and as agent of City of Chicago; ROBERT GALLAS, individually, and as agent of the City of Chicago; JOHN OKEEFE, individually and as agent of the City of Chicago; DANIEL PACELLI, individually and as agent of the City of Chicago; VINCENT CIOCCI, individually and as agent of the City of Chicago; and MICHAEL KARCZEWSKI, individually and as agent of the City of Chicago, and each of them in excess of One Million Dollars, \$1,000,000.00, plus costs.

**COUNT VI**

**ILLINOIS COMMON LAW INTENTIONAL INFLECTION OF EMOTIONAL  
DISTRESS**

NOW COMES Plaintiff, ERIC B. CORDER, by and through his Attorney, BRIAN J. GRABER, LTD., and complaining Defendants, Defendants, CITY OF CHICAGO; ROBERT STEGMILLER, individually and as agent of City of Chicago; ROBERT GALLAS, individually, and as agent of the City of Chicago; JOHN OKEEFE, individually and as agent of the City of Chicago; DANIEL PACELLI, individually and as agent of the City of Chicago; VINCENT CIOCCI, individually and as agent of the City of Chicago; and MICHAEL KARCZEWSKI, individually and as agent of the City of Chicago, and each of them, intentionally inflicted emotional distress on the Plaintiff and in support thereof states as follows:

1-37. Plaintiff re-alleges Paragraphs 1 through 37 as Paragraphs 1 through 37 of Count VI.

38. On or about October 26, 2014, at all times mentioned herein, Defendant, CITY OF CHICAGO, employed Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, as Chicago Police officers with authority to arrest and imprison citizens.

39. On or about October 26, 2014, and at all times mentioned herein, Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, were agents and employees of the Defendant, CITY OF CHICAGO, acting within the scope of their employment as Chicago Police officers.

40. On or about October 26, 2014, Defendant, CITY OF CHICAGO, acting through its agents and employees, Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI,

CIOCCI, and KARCZEWSKI, and each of them, acted with extreme and outrageous conduct and without any probable cause arrested, imprisoned, and fabricated evidence that Plaintiff, ERIC CORDER, committed crimes causing Plaintiff, ERIC CORDER, to suffer extreme emotional distress.

41. As a direct and proximate cause of Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, caused Plaintiff extreme emotional distress including but not limited to insomnia, intimidation, loss of appetite, anxiety, and fear of impending doom.

42. As a direct and proximate cause of Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, falsely imprisoning Plaintiff, ERIC CORDER, he suffered damages including but not limited to compensatory damages for mental and emotional pain and suffering, loss of normal life, loss of enjoyment of life, lost income, or inability to work.

43. As a direct and proximate cause of Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, acted with maliciously or in reckless disregard for Plaintiff's right to be free from false imprisonment and seeks an award of punitive damages against them.

WHEREFORE the Plaintiff, ERIC B. CORDER, seeks judgment against Defendants, CITY OF CHICAGO; ROBERT STEGMILLER, individually and as agent of City of Chicago; ROBERT GALLAS, individually, and as agent of the City of Chicago; JOHN OKEEFE, individually and as agent of the City of Chicago; DANIEL PACELLI, individually and as agent of the City of Chicago; VINCENT CIOCCI, individually and as agent of the City of Chicago;

and MICHAEL KARCZEWSKI, individually and as agent of the City of Chicago, and each of them in excess of One Million Dollars, \$1,000,000.00, plus costs.

## **COUNT VII**

### **MALICIOUS PROSECUTION**

NOW COMES Plaintiff, ERIC B. CORDER, by and through his Attorney, BRIAN J. GRABER, LTD., and complaining Defendants, Defendants, CITY OF CHICAGO; ROBERT STEGMILLER, individually and as agent of City of Chicago; ROBERT GALLAS, individually, and as agent of the City of Chicago; JOHN OKEEFE, individually and as agent of the City of Chicago; DANIEL PACELLI, individually and as agent of the City of Chicago; VINCENT CIOCCI, individually and as agent of the City of Chicago; and MICHAEL KARCZEWSKI, individually and as agent of the City of Chicago, and each of them, for malicious prosecution and in support thereof states as follows:

1-37. Plaintiff re-alleges Paragraphs 1 through 37 as Paragraphs 1 through 37 of Count VII.

38. On or about October 26, 2014, at all times mentioned herein, Defendant, CITY OF CHICAGO, employed Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, as Chicago Police officers with authority to arrest and imprison citizens and bring criminal proceedings.

39. On or about October 26, 2014, and at all times mentioned herein, Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, were agents and employees of the Defendant, CITY OF CHICAGO, acting within the scope of their employment as Chicago Police officers.

40. On or about October 26, 2014, Defendant, CITY OF CHICAGO, acting through its agents and employees, Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, without any probable cause arrested and imprisoned Plaintiff, ERIC CORDER.

41. On or about October 26, 2014, Defendant, CITY OF CHICAGO, acting through its agents and employees, Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, arrested and imprisoned Plaintiff, ERIC CORDER, without any reasonable grounds to believe Plaintiff committed any offense.

42. On or about October 26, 2014, Defendant, CITY OF CHICAGO, acting through its agents and employees, Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, acting with malice and intent caused the commencement of criminal proceedings against, Plaintiff, ERIC CORDER, in criminal case No. 14 CR 2169201.

43. On or about July 15, 2016, the criminal case No. 14 CR 2169201 was dismissed by the Cook County State's attorney because they did not have sufficient evidence to prosecute Plaintiff, ERIC CORDER.

44. At no time did Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, have any probable cause to bring criminal charges against Plaintiff, ERIC CORDER, in criminal case No. 14 CR 2169201.

44. As a direct and proximate cause of Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, maliciously prosecuting Plaintiff, ERIC CORDER, he suffered damages including but not



limited to compensatory damages for mental and emotional pain and suffering, loss of normal life, loss of enjoyment of life, lost income, or inability to work.

45. As a direct and proximate cause of Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, acted with maliciously or in reckless disregard for Plaintiff's right to be free from false imprisonment and seeks an award of punitive damages against them.

WHEREFORE the Plaintiff, ERIC B. CORDER, seeks judgment against Defendants, CITY OF CHICAGO; ROBERT STEGMILLER, individually and as agent of City of Chicago; ROBERT GALLAS, individually, and as agent of the City of Chicago; JOHN OKEEFE, individually and as agent of the City of Chicago; DANIEL PACELLI, individually and as agent of the City of Chicago; VINCENT CIOCCI, individually and as agent of the City of Chicago; and MICHAEL KARCZEWSKI, individually and as agent of the City of Chicago, and each of them in excess of One Million Dollars, \$1,000,000.00, plus costs.

### **COUNT VIII**

#### **ILLINOIS CIVIL CONSPIRACY**

NOW COMES Plaintiff, ERIC B. CORDER, by and through his Attorney, BRIAN J. GRABER, LTD., and complaining Defendants, Defendants, CITY OF CHICAGO; ROBERT STEGMILLER, individually and as agent of City of Chicago; ROBERT GALLAS, individually, and as agent of the City of Chicago; JOHN OKEEFE, individually and as agent of the City of Chicago; DANIEL PACELLI, individually and as agent of the City of Chicago; VINCENT CIOCCI, individually and as agent of the City of Chicago; and MICHAEL KARCZEWSKI, individually and as agent of the City of Chicago, and each of them engaged in a civil conspiracy to fabricate evidence and without any probable cause to falsely imprison, maliciously prosecute,

and intentionally inflict emotional distress on Plaintiff, ERIC CORDER, and in support thereof states as follows:

1-37. Plaintiff re-alleges Paragraphs 1 through 37 as Paragraphs 1 through 47 of Count VIII.

38. On or about October 26, 2014, at all times mentioned herein, Defendant, CITY OF CHICAGO, employed Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, as Chicago Police officers with authority to arrest and imprison citizens and bring criminal proceedings.

39. On or about October 26, 2014, and at all times mentioned herein, Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, were agents and employees of the Defendant, CITY OF CHICAGO, acting within the scope of their employment as Chicago Police officers.

40. On or about October 26, 2014, Defendant, CITY OF CHICAGO, acting through its agents and employees, Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, without any probable cause arrested and imprisoned Plaintiff, ERIC CORDER.

41. On or about October 26, 2014, Defendant, CITY OF CHICAGO, acting through its agents and employees, Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, arrested and imprisoned Plaintiff, ERIC CORDER, without any reasonable grounds to believe Plaintiff committed any offense.

42. On or about October 26, 2014, Defendant, CITY OF CHICAGO, acting through its agents and employees, Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, acting with malice and intent caused the

commencement of criminal proceedings against, Plaintiff, ERIC CORDER, in criminal case No. 14 CR 2169201.

43. On or about October 26, 2014, Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, reached an agreement to unlawfully fabricate evidence against Plaintiff, ERIC CORDER, to falsely imprison him falsely arresting Plaintiff maliciously prosecuting Plaintiff claiming that he was manufacturing and dealing heroin in violation of 720 ILCS 507/407(B)(1) and 720 507/407(C)(1) so as to intentionally cause Plaintiff emotional distress.

44. On or about October 26, 2014, Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, overt acts of fabricating evidence against Plaintiff, ERIC B. CORDER, to create probable cause that he was manufacturing and dealing heroin in violation of Illinois law to deprive Plaintiff, ERIC B. CORDER, of his freedom and to maliciously prosecute him for crimes without any probable cause so as to inflict emotional distress.

40. Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, had a meeting of the minds where they lent their minds and physical presence and support along with the support of each other's badges and office, acting in concert detaining, arresting, and searching Plaintiff, ERIC B. CORDER, including fabricating testimony, police reports, and physical evidence for the express purpose of depriving the Plaintiff, ERIC B. CORDER, of his liberty and maliciously prosecute him for crimes without any probable cause.

41. As a direct and proximate cause of Defendants, CITY OF CHICAGO, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of

them, conspiring to deprive Plaintiff, ERIC CORDER'S liberty and maliciously prosecuting him for crimes without probable cause and by fabricating evidence against Plaintiff, ERIC CORDER, Plaintiff suffered damages including but not limited to compensatory damages for mental and emotional pain and suffering, loss of normal life, loss of enjoyment of life, lost income, or inability to work.

42. As a direct and proximate cause of Defendants, STEGMILLER, GALLAS, O'KEEFE, PACELLI, CIOCCI, and KARCZEWSKI, and each of them, acted with maliciously or in reckless disregard for Plaintiff's rights by conspiring to fabricate evidence against Plaintiff, ERIC B. CORDER, to deprive him of his freedom and to maliciously prosecute him so as to inflict emotional distress and Plaintiff seeks an award of punitive damages.

WHEREFORE the Plaintiff, ERIC B. CORDER, seeks judgment against Defendants, CITY OF CHICAGO; ROBERT STEGMILLER, individually and as agent of City of Chicago; ROBERT GALLAS, individually, and as agent of the City of Chicago; JOHN OKEEFE, individually and as agent of the City of Chicago; DANIEL PACELLI, individually and as agent of the City of Chicago; VINCENT CIOCCI, individually and as agent of the City of Chicago; and MICHAEL KARCZEWSKI, individually and as agent of the City of Chicago, and each of them in excess of One Million Dollars, \$1,000,000.00, plus costs.

#### **IX. JURY DEMAND**

Plaintiff, ERIC CORDER, demands trial by jury on all issues in this action.

/s/ Brian J. Graber  
Attorney for Plaintiff

Brian J. Graber  
BRIAN J. GRABER, LTD.  
Attorney for Plaintiff, Eric Corder  
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**CERTIFICATE OF SERVICE**

I hereby certify that Plaintiff's Corrected Amended Complaint at Law was served on Carla M. Kupe-Arion, Assistant Corporation Counsel, Attorneys for Defendants, City of Chicago, Robert Stegmiller, Robert Gallas, and John O'Keefe, by means of the Court's ECF system on this day, November 16, 2016, and all others through the U.S. Marshall's Office.

/s/ Brian J. Graber  
Attorney for Plaintiff

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